



## ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

Via Overnight Delivery and Electronic Comment Filing Submission (ECFS)

February 17, 2017

Ms. Marlene H. Dortch, Secretary  
Federal Communications  
Commission 445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: ASL Services Holdings, LLC dba GlobalVRS Submission in Support of *Video Relay Service (VRS) Rate Proposal*, CG Docket No. 10-51; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123

Dear Secretary Dortch:

ASL Services Holdings, LLC dba GlobalVRS ("Global VRS") submits the attached financial statement in support of the non-dominant providers<sup>1</sup> January 31, 2017 *Video Relay Service (VRS) Rate Proposal*, in the above-referenced proceeding.

GlobalVRS' submission demonstrates that the Company's financial condition has worsened and remains dire despite adoption of the Commission's March 2016 temporary rate freeze.<sup>2</sup>

**Request for Highly Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules,<sup>3</sup> "Exemption 4" of the Freedom of Information Act,<sup>4</sup> and the Commission's *Second Protective Order* in the instant proceeding,<sup>5</sup> GlobalVRS respectfully requests that entirety of its submission be designated as "Highly Confidential" and subject to the strict protections accorded under the *Second Protective Order*.

GlobalVRS' financial statement constitutes a "trade secret" as set forth in Section 0.457 of the Commission's rules,<sup>6</sup> in that the information reveals specific strategic actions taken by the Company that would be useful to competitors. Further, the Company's financial statement

<sup>1</sup> Purple Communications, Inc., Convo Communications, LLC, CSDVRS, LLC dba ZVRS, and GlobalVRS.

<sup>2</sup> See *Structure and Practices of the Video Relay Service Program* et al., CG Docket Nos. 10-51 & 03-123, Report and Order, FCC 16-25 (Mar. 3, 2016).

<sup>3</sup> 47 C.F.R. §0.459.

<sup>4</sup> 47 C.F.R. §0.457(d). See *National Parks and Conservation Assn. v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974) ("National Parks"); Southern Company Request for Waiver of Section 90.629 of the Commission's Rules, 14 FCC Rcd. 1851, 1860 (1998).

<sup>5</sup> See *Structure and Practices of the Video Relay Service Program* et al., CG Docket Nos. 10-51 & 03-123, Second Protective Order, DA 12-858 (May 31, 2012) [*Second Protective Order*].

<sup>6</sup> 47 C.F.R. §0.457.

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contains highly confidential information not intended for public consumption. GlobalVRS would not otherwise make this information publically available under any circumstance. Release of this information the public could cause GlobalVRS irreparable and inestimable harm. GlobalVRS requests that the redacted sections be withheld from public inspection, accordingly. Should disclosure of the redacted sections be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests.

In support of its request and pursuant to Section 0.459(b) of the Commission's rules, GlobalVRS states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

GlobalVRS requests "Highly Confidential" designation for the entire financial statement.

**2. Identification of the circumstances giving rise to the submission.**

GlobalVRS is providing confidential financial information to demonstrate the need for the *Video Relay Service (VRS) Rate Proposal*.

**3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.**

The confidential information constitutes detailed confidential information revealing the GlobalVRS operations that could be useful to competing providers. This information is safeguarded from competitors and is not made to the public accordingly.

**4. Explanation of the degree to which the information concerns a service that is subject to competition**

The Highly Confidential information involves video relay services, a highly competitive service now dominated by two providers.

**5. Explanation of how disclosure of the information could result in competitive harm.**

Disclosure of confidential information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's relative size; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete.



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**6. Identification of any measures taken to prevent unauthorized disclosure.**

GlobalVRS treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to competitors, the public, or third parties.

**7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.**

GlobalVRS does not make the redacted information to the public or to third parties. The highly confidential has been provided to the Commission.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

This information is being submitted by GlobalVRS. GlobalVRS requests that the redacted information be treated as highly confidential indefinitely as the Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to Global VRS.

GlobalVRS hereby places other parties on notice that it will vigorously prosecute breaches of the *Second Protective Order* should they occur.

In accordance with the Commission's *Second Protective Order*, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov). A public inspection copy has been filed with in the Commission's electronic comment filing system.

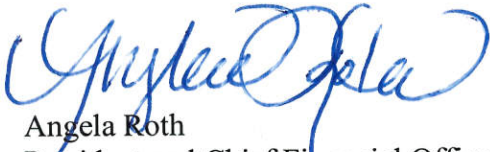
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Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC dba GlobalVRS



Angela Roth  
President and Chief Financial Officer

Attachment

cc: TRSreports@fcc.gov  
Eliot Greenwald (via electronic delivery)  
Karen Peltz Strauss (via electronic delivery)  
Robert Aldrich (via electronic delivery)  
Michael Scott (via electronic delivery)